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7 Attorneys for Defendant Roy Stockton

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13 **UNITED STATES DISTRICT COURT**  
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15 **EASTERN DISTRICT OF CALIFORNIA**  
16  
17 **SACRAMENTO DIVISION**

18 NAKIA V. PORTER, et al.,

19 Plaintiffs,

20 v.

21 COUNTY OF SOLANO, et al.,

22 Defendants.

23 Case No. 2:21-CV-01473-KJM-JDP

24 **JOINT STATUS REPORT PURSUANT TO**  
25 **COURT'S ORDER ON JULY 9, 2024**

26 Hon. Kimberly J. Mueller  
27 Chief United States District Judge

28 Pursuant to the Court's Order on July 9, 2024, the Parties have met and conferred and file the  
29 following joint status report, including: (1) proposed dates for limited fact discovery on *Monell* liability  
30 issues, (2) expert disclosures and reports limited to *Monell* liability and (3) a proposed new deadline to  
31 file dispositive motions. The Parties make the following requests:

32 1. Fact discovery limited to *Monell* liability shall be completed by August 30, 2024.  
33 However, because the Magistrate Judge's future availability to resolve discovery disputes is unknown at  
34

1 this time, matters pending before the Magistrate Judge prior to this limited fact discovery cut-off  
 2 concerning this limited fact discovery may be resolved after the cut-off.

3       2. Supplemental expert disclosures related to *Monell* liability shall be completed by  
 4 September 13, 2024.

5       3. The deadline for dispositive motions to be filed shall be September 20, 2024, with  
 6 oppositions to be filed by October 18, 2024, and replies to be filed by November 1, 2024. The dispositive  
 7 motions hearing shall be noticed and set for December 20, 2024.

8       For the Court's convenience, the proposed schedule is summarized below:

<u>Event</u>	<u>Current Date</u>	<u>Proposed Date</u>
Fact Discovery Cut-Off for the Limited <i>Monell</i> liability Discovery (Given that the Magistrate Judge's future availability to resolve discovery disputes is unknown at this time, matters pending before the Magistrate Judge prior to the cut-off may be resolved after the cut-off).	N/A	August 30, 2024
Supplemental Expert Disclosure re <i>Monell</i> liability	N/A	September 13, 2024
Dispositive Motions Filing Deadline	August 15, 2024	September 20, 2024
Dispositive Motions Opposition Deadline	Per Local Rules	October 18, 2024
Dispositive Motions Reply Deadline	Per Local Rules	November 1, 2024
Dispositive Motions Hearing Date		December 20, 2024

25       4. No trial date has been set.

26       5. This stipulation is being filed in good faith and not for purposes of delay.

1 IT IS SO STIPULATED  
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3 Dated: July 11, 2024

ALMADANI LAW

4 /s/ Yasin M. Almadani

5 Yasin M. Almadani, Esq.

6 AI LAW, PLC

7 /s/ Ahmed Ibrahim

8 Ahmed Ibrahim, Esq.

9 Attorneys for Plaintiffs

10 Dated: July 11, 2024

11 HAWKINS PARNELL & YOUNG

12 /s/ Danielle K. Lewis

13 Danielle K. Lewis, Esq.

14 Miles F. Maurino, Esq.

15 Attorneys for Defendants County of Solano, Solano  
16 County Sheriff's Office, Sheriff Thomas A. Ferrara,  
17 Dalton McCampbell, Lisa McDowell, Connor  
18 Hamilton, and Chris Carter

19 Dated: July 11, 2024

20 BERTRAND, FOX, ELLIOT, OSMAN & WENZEL

21 /s/ Gregory M. Fox, Esq.

22 Gregory M. Fox, Esq.

23 Attorneys for Defendant Roy Stockton

1 **CERTIFICATE OF SERVICE**

2 I, Yasin M. Almadani, hereby certify that I have electronically filed the above-captioned  
3 document with the Clerk of the Court using the CM/ECF system, which will automatically send an e-  
4 mail notification of the filing to all counsel of record.

5 I declare under penalty of perjury under the laws of the United States that the foregoing is true  
6 and correct.

7  
8 Dated: July 11, 2024

ALMADANI LAW

9 /s/ Yasin M. Almadani  
10 Yasin M. Almadani

11 *Attorney for Plaintiffs*

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